

Public Notification to Solicit Comments and Notice of Public Hearing on the Proposed New Source Review/Prevention of Significant Deterioration Permit for Allegheny Energy Center LLC – Invenergy LLC

Notice is hereby given under Article XXI, §2102.05(c), that the Allegheny County Health Department (ACHD) is soliciting comments on the Proposed New Source Review/Prevention of Significant Deterioration Permit for Allegheny Energy Center LLC (AEC), 2130 Margaret Street Ext., West Newton, PA 15089 as described in the Company's March 20, 2019, Permit Application and subsequent supplemental submissions. Specifically, the installation consists of a new one-on-one, nominal 639 MW power plant that will include one combustion turbine, one heat recovery steam generator with supplemental duct firing, and one steam turbine. The proposed combustion turbine will fire clean low sulfur pipeline-quality natural gas and will be equipped with low NO_x burners, selective catalytic reduction (SCR), and an oxidation catalyst. Additionally, the proposed project will include one auxiliary boiler, one dew point heater, one emergency generator, one fire water pump, and three above-ground storage tanks including a 20,000-gallon aqueous ammonia storage tank will be included as part of the facility.

Copies of documents are open for public inspection by request at agpermits@alleghenycounty.us or 412-578-8115. In addition, the proposed permit may be downloaded from the Department's webpage at <https://www.alleghenycounty.us/Health-Department/Programs/Air-Quality/Public-Comment-Notices.aspx>. Written comments may be submitted to the Department at 301 39th Street, Pittsburgh, PA 15201 or by e-mail at agpermits@alleghenycounty.us by the end of the day on Tuesday, June 8, 2021. A virtual public hearing will be held regarding the proposed issuance of these permits on Tuesday, June 8, 2021 at 10 am. Persons wishing to join the hearing or present testimony should contact agpermits@alleghenycounty.us or 412-578-8115 at least 24 hours in advance of the hearing. Information will be provided on the Department's permits webpage. If by 12 pm on Thursday, June 3, 2021, no person has expressed in interest in testifying at the hearing, the hearing will be cancelled. If the hearing is cancelled, the Department will provide public notice on the webpage.

Based on the information provided by the applicant and ACHD's own analysis, the project will result in the following combined potential emissions increases for all proposed equipment: Nitrogen Oxides: 145.7 tons/yr; Carbon Monoxide: 170.44 tons/yr; Volatile Organic Compounds: 93.4 tons/yr; Sulfur Oxides: 23.89 tons/yr; Particulate Matter/PM₁₀/PM_{2.5}: 88.65 tons/yr; Total HAP: 10.5 ton/yr. Based on the information above, the installation of the new units will result in a significant net increase in NO_x, CO, VOC, PM₁₀, PM_{2.5}, H₂SO₄ emissions under the Prevention of Significant Deterioration (PSD) regulations and Nonattainment New Source Review (NNSR) regulations; a net increase in SO_x and Pb emissions that are less than the PSD and NNSR significance thresholds.

Based on the information provided by the applicant and ACHD's own analysis, the potential emissions from the AEC Invenergy Facility will not significantly impact air quality. To assure compliance with the applicable standards, ACHD has placed the following conditions in addition to the emissions limitations indicated above in the proposed Permit:

1. Operational limitations requiring the combustion of only pipeline-quality natural gas in the CT and Auxiliary Boiler and the use of low NO_x burners, selective catalytic reduction, and an oxidation catalyst in the CT; including start-up and shutdown emissions in the emission rates; requiring effective combustion and operational control practices for all combustion equipment; limiting emergency generator and fire pump use to ultra-low sulfur diesel and limited hours per year. The permit includes the applicable requirements of 40 CFR Part 60 Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines*, Part 60, Subpart TTTT – *Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units*, Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*. Part 63, Subpart YYYY - *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* 40 CFR Part 63, and Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

2. NO_x Emission Offsets - requiring the permittee to demonstrate that emission reduction credits from the PADEP registry system or emissions reductions from existing sources in Allegheny County are secured to offset the net increase in NO_x and VOC emissions from the project by at least the ratios set forth in Article XXI §2102.06.b.4.
3. Testing Requirements including emissions testing per Article XXI 2108.02(a) for NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, NH₃, and H₂SO₄ mist on the CT and HRSG stack; testing for NO_x on the auxiliary boiler.
4. Monitoring Requirements including installation, operation and maintenance of continuous emission monitors on the CT for NO_x and CO; monitoring of SCR catalytic bed inlet gas temperature, pressure differential, and NH₃ injection rate; installation, operation and maintenance of non-resettable hour meters on the emergency generator and fire pump.
5. Recordkeeping including recording of sufficient data to demonstrate compliance with the permit conditions. The records shall include at a minimum records of all required monitoring data; records of the results of required inspections, episodes of non-compliance with any permit condition, and corrective actions taken; records of all the stack tests performed; records of the date, time and duration of any malfunction, the cause of the malfunction and the action taken to correct the malfunction; records of fuel consumption; records of each adjustment conducted on the combustion units; records of cold starts and operating hours for the emergency generators and fire pump; records of diesel fuel certifications from fuel suppliers.
6. Reporting Requirements including semi-annual reports of monthly fuel usage as applicable; reports of data collected by the CEM systems including each instance during the reporting period during which emissions exceeded the applicable emission limitations, an identification of each period during which the continuous emission monitoring system was inoperative, except for zero and span drift checks, and an identification of calibrations, zero and span drift checks, and other quality assurance procedures; reports of the results of NO_x continuous emissions monitoring; semi-annual reports of required control device monitoring data; monthly hours of operation for the emergency generators and fire pump; episodes of non-compliance with any permit condition and corrective actions taken; and malfunction events.